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9 **Attorneys for Defendant**
10 **GARY GOULIN**

11 **UNITED STATES DISTRICT COURT**

12 **CENTRAL DISTRICT OF CALIFORNIA**

13 THE UNITED STATES OF)	CASE NO.: 22-CR-00476-MEMF
14 AMERICA,)	
15 Plaintiff,)	SUPPLEMENTAL SENTENCING
16 vs.)	MEMORANDUM
17)	
18 GARY GOULIN,)	
19 Defendant)	
20)	

21 Defendant Gary Goulin, by and through his counsel, WERKSMAN JACKSON &
22 QUINN LLP, (hereinafter "Defendant") files this Supplemental Memorandum to
23 clarify an issue that arose at the sentencing hearing on October 13, 2023.

24 In his presentation to the Court, defense counsel stated that only a small
25 portion of the pornographic material at issue involved children. The Government
26 replied that, of the 61 discs that contained child pornography, the discs were almost
27 exclusively child pornography. The Court asked for clarification about this
28 apparent factual dispute between the parties.

1 The defense does not dispute that of the 61 discs containing child
2 pornography, each disc was largely if not entirely child pornography. The point
3 defense counsel was making was that those 61 discs were only a fraction of the
4 pornographic material collected from Mr. Goulin's home. Attached as Exhibit A is
5 the Los Angeles Police Department Property Receipt from the search of Mr.
6 Goulin's home. Item 21 on the property receipt is the 61 discs containing child
7 pornography, which were recovered from under Mr. Goulin's bed. Item 22 is 225
8 other DVDs collected from Mr. Goulin's home, which also contained pornography
9 but none involving children. Thus, of the 286 discs of pornography in Mr. Goulin's
10 possession, only about 20% constituted child pornography.

11 The was a minor factual point that defense counsel thought was worth
12 mentioning, and given the Court's inquiries, it seemed appropriate to clarify ahead
13 of the next sentencing hearing.

14
15 November 20, 2023

Respectfully submitted,

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18 _____
19 Mark J. Werksman
20 Karen M. Sosa
21 Attorneys for Defendant Gary Goulin
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EXHIBIT A

PROPERTY REPORT

Page 1 of 2

<input type="checkbox"/> NARC	<input type="checkbox"/> FIREARM	<input checked="" type="checkbox"/> SEARCH	<input type="checkbox"/> MONEY	TOTAL U.S. CURR. BKD.	EVID.	NON-EVID.	IF RELATED TO PREV BKD EVID, USE THAT DR
					<input checked="" type="checkbox"/>	<input type="checkbox"/>	DR 21-07-15108
				ONLY 1 CATEGORY PER REPORT			

DATE AND TIME OF THIS REPORT 11/04/2021 1600		DATE PROPERTY BKD. 11/04/2021		IF RELATED TO PREVIOUSLY BOOKED EVIDENCE, ORIG. EVID. BKD. TO (IN THIS CASE COMPLETE ENTIRE REPORT)			DATE ORIG. EVID. TAKEN INTO CUSTODY	
RESIDENCE ADDRESS 8333 W 4th Street Los Angeles CA 90048				ARRESTEE <input checked="" type="checkbox"/> EVID. CONT. OF ARREST REPORT Goulin, Gary David		DOB 02/04/1961		CHARGE BKD. DR
RESIDENCE ADDRESS (BUS. ADDRESS IF VICT. IS BUSINESS)				VICTIM <input type="checkbox"/> EVID. CONT. OF PIR (IF NO ARRESTEE)				BKG. # 6272600
RESIDENCE ADDRESS				<input type="checkbox"/> OWNER OR IF UNKNOWN <input type="checkbox"/> FINDER/POSSESSOR				R - <input type="checkbox"/> B - <input type="checkbox"/>
AREA OR CITY, & DATE CRIME OCCUR. 0722 06/01/2021				TYPE OF PREMISES Single Family		DEPT. EMPLOYEE IF BOOKED TO SERIAL NO. DIVISION		IF FIREARM, CRT CHECKS: AFS YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> NCIC YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
IS THIS STOLEN PROPERTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		PROBABLE CRIME 311.11(A) PC		<input checked="" type="checkbox"/> FELONY <input type="checkbox"/> MISD		DATE & TIME PROP. FOUND TAKEN INTO POLICE CUSTODY - LOCATION 11/04/2021 7:00 8333 W 4th Street, Los Angeles 90048		RD, OR CITY IF OUTSIDE 0722
IS THIS FOUND PROPERTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		DATE & TIME FOUND PROPERTY DISCOVERED		LOCATION DISCOVERED				RD, OR CITY IF OUTSIDE
INVESTIGATIVE UNIT Juvenile Division		PROP. BKD. AT Harbor Div		NOTIFICATIONS - PERSONS & UNITS			CONNECTING REPORTS - TYPE & DR Arrest Report Same DR#	
Use of Evidence Continuation: Use only with Arrest Report or, if no Arrest Report, with PIR. Do not use if evidence is related to previously booked evidence. To book evidence, staple this page on top of Arrest Face Sheet (or PIR Face Sheet, if no arrest) and forward with evidence.								
1. CIRCUMSTANCES (WHERE FOUND, BY WHOM, HOW MARKED, ETC.) EXPLAIN IF 10.10.00 NOT ISSUED. GIVE RESULTS OF CRT CHECKS ON FIREARMS. 2. ITEMIZE PROPERTY (LIST NARCOTICS FIRST, THEN MONEY, FIREARMS, PROPERTY WITH SERIAL NUMBERS, AND OTHER PROPERTY, IF RELATED TO PREVIOUSLY BKD. EVIDENCE, START WITH NEXT SEQUENTIAL ITEM NUMBER). 3. IS PROPERTY ELIGIBLE FOR IMMEDIATE DISPOSAL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> IF YES, LIST ITEM #S. ENSURE AN "EXTRA COPY" IS FORWARDED TO THE PROPERTY DISPOSITION COORDINATOR (PDC) FOR INPUT INTO APIMS. IF PROPERTY IS ELIGIBLE FOR RELEASE, COMPLETE A PROPERTY DISPOSITION UPDATE REQUEST FORM 10.06.00 AND FORWARD IT TO THE PDC FOR INPUT INTO APIMS.								
ITEM NO.	QUANT.	ARTICLE	SERIAL NO./TYPE TEST OF DRUG	BRAND/DRUG WEIGHT UNITS	MODEL NO./DRUG TEST RESULT	MISC. COLOR, SIZE, INSCRIPTION, CALIBER, ETC. IF MULT. ARREST, INCL. NAME/BKG. # FROM WHOM TAKEN		
On November 4, 2021, a residential search warrant was executed at the above listed address pursuant to a possession of child pornography investigation. The following items of property, owned by Gary David Goulin, were found to contain evidence of child sexual abuse material or have yet to be previewed/examined due to quantity. Items 1-24 were recovered from Goulin's bedroom. Items 25-33 were recovered from the middle bedroom. Items 34 and 35 were recovered from the office.								
1	1	Cell phone		Apple	A1502	Blue iPhone, pin code 2492		
2	1	Tablet	DMPDH2L7NRC9	Apple	A2228	Silver iPad		
3	1	Laptop computer	C02XC75VJGH5	Apple	A1990	Silver laptop, with power cord		
4	1	Watch		Apple		Blk in color with blk band, with 3 wht chargers		
5	1	Ext Hard Drive	NL381V5H	Porsche Design	LRD0PS2	Silver in color, 4 TB with cord		
6	1	Ext Hard Drive	SDSSDE60	SanDisk	2T00	Blk in color, 2 TB with cord, "Gary's Photos"		
7	1	Thumb Drive	D33724	SanDisk	SDCZ88-128G	Silver/Blk in color, 128GB, Extreme Pro		
8	1	Thumb Drive	BR210458047W	SanDisk	SDCZ48-512G	Blk in color, 512 GB, Ultra		
9	1	Thumb Drive		SanDisk		Silver/Gray in color		
10	1	Thumb Drive		SanDisk		Blue in color, 512 GB		
Preliminary Drug Test		SUPERVISOR/INVESTIGATING OFFICER TESTING			SERIAL NO.		WITNESSING OFFICER	
Search Warrant Info		DATE 11/01/2021			ISSUED BY JUDGE Laura Laesecke			COURT NO. 19
SUPERVISOR APPROVING		SERIAL NO.		10.10.00 ISSUED? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		REPORTING EMPLOYEE(S) C. Monterroso		SERIAL NO. 35698
DATE & TIME REPRODUCED		DIVISION		CLERK		DIV. Juv		DETAIL ICAC
								PERSON REPORTING (SIGNATURE) X

PROPERTY REPORT

DR NO. 7400

ITEM NO.	QUANT.	ARTICLE	SERIAL NO./TYPE TEST OF DRUG	BRAND/DRUG WEIGHT, UNITS	MODEL NO./DRUG TEST RESULT	MISC.-COLOR, SIZE, INSCRIPTION, CALIBER, ETC. IF MULT. ARREST, INCL. NAME/BKG. # FROM WHOM TAKEN
11	1	Ext Hard Drive	NA9C7L0Q	Seagate	SRD00F1	Blk/Silver in color, 2 TB, with blk cord
12	2	Ext Hard Drives		SanDisk	SDSSDE60-500G	Blk/Red in color, 500 GB, with cords
13	1	Memory Card		SanDisk		Blk/Orange in color, 32 GB
14	1	Memory Card		SanDisk		Blk/Orange in color, 64 GB
15	1	Tablet	91W0111000255	Wacom	PTH-460	Blk in color, with charger
16	1	Thumb Drive		Crucial		Blk in color
17	1	Camera	072021001471	Cannon	DS126836	Blk in color, EOS R5, with blk strap/lens cap
18	2	Memory Cards	BQ2035453050Y	SanDisk	2040EZ	Blk in color, 256 GB, were in item 17
19	1	Ext Hard Drive	NA9EDT7M	Seagate	SRD00F1	Red/Blk in color, 2 TB
20	1	Ext Hard Drive		SanDisk	SDSSDE80-1T00	Blk/Orange in color, 1 TB, with cord
21	61	DVD's		Verbatim		Unmarked DVD's in clear plastic bag
22	225	DVD's		Various		Unmarked DVD's in 2 clear plastic bags
23	1	Ext Hard Drive	WCC7K6ZJVD4F	Western Digital		White/Gray in color, with power cord
24	1	Thumb Drive		Lexar		Silver in color
25	1	Thumb Drive		BW		White in color
26	1	Thumb Drive		A Data	UV128	Blk/Yellow in color, 64 GB
27	1	Memory Card		Crucial Technology	BL11114.KN	Blk/Blue in color, 128 GB
28	1	SD Card	B11015216028G	Transcend		Blue in color, 8 GB
29	1	Ext Hard Drive	JH2426M	Firelite	FWFL30	Silver in color, 30 GB, "Sandy's itunes"
30	1	iPad	GB012RRWZ3A	Apple	A1219	Silver in color
31	9	DVD's		Various		Various markings in clear plastic bag
32	15	DVD's/CD's		Various		Various markings in clear plastic bag
33	1	iMac Computer	D25TW1Q131GQ	Apple	A1419	Silver in color, with power cord
34	1	Keyboard		Apple		Silver/White in color
35	1	Ext Hard Drive	NA9C7L4M	Seagate	7RD00F1	Silver/Blk in color, 2 TB, with cord
36	1	Ext Hard Drive	NA9DSG6W	Seagate	SRD00F1	Blue/Blk in color, 2 TB, with cord
37	1	Ext Hard Drive	NA9B4CDT	Seagate	SRD00F1	Silver/Blk in color, 1 TB, with cord
38	1	Ext Hard Drive	WX81A6142689	Western Digital	WDBACX0010BBK	Blk in color, CD Library, with cord
39	1	Ext Hard Drive	WXP1A50X0556T	Western Digital	WDBABM0010BBK	Blk in color, 1 TB, with cord
40	1	Ext Hard Drive	WX61C50E4206T	Western Digital	WDBABM0010BBK	Blk in color, 1 TB, with cord
41	1	Ext Hard Drive	WXN1A38R1308	Western Digital	WDBKYJ0020BSL	Silver/Blk in color, with cord
42	1	Ext Hard Drive	WX61E8531V9A	Western Digital	E2B	Silver in color, 2 TB, with cord
43	1	Ext Hard Drive	WXF1E26D7JHT	Western Digital	WDBEZW0020BSL	Silver/Blk in color, 2 TB, with cord